IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

DEUTSCHE BANK TRUST COMPANY AMERICAS, in its capacity as successor indenture trustee for certain series of Senior Notes, *et al.*,

Plaintiffs.

v.

C.A. No. 11-618 GMS

SOWOOD ALPHA FUND, LP, et al.,

Defendants.

DEFENDANT LUCENT TECHNOLOGIES INC. MASTER PENSION TRUST'S RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable judges and magistrate judges of the Court to evaluate possible disqualification or recusal, Defendant Lucent Technologies Inc. Master Pension Trust, by and through its undersigned counsel, hereby states that the Lucent Technologies Inc. Master Pension Trust (the "Trust") is a trust established by Lucent Technologies Inc., now known as Alcatel-Lucent USA Inc. ("ALUSA"), for the purpose of holding assets of certain employee pension benefit plans maintained by ALUSA for the benefit of eligible employees. The Trust has no parent corporation and no publicly held corporation owns 10% or more of its stock.

GIBBONS, P.C.

By: /s/ Christopher Viceconte Christopher Viceconte (DE Bar #5568) 1000 N. West Street, Suite 1200 Wilmington, DE 19801-1058 Tel: (302) 295-4875

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Lucent Technologies Inc. Master Pension Trust

Dated: November 1, 2011